Southern Nuclear

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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.1.02.08e [Index Number 40]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of July 10, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.02.08e [Index Number 40] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing this ITAAC. Southern Nuclear Operating Company will, at a later date, provide additional notifications for ITAAC that have not been completed 225-days prior to initial fuel load.

This notification is informed by the guidance described in NEI 08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52,* which was endorsed by the NRC in Regulatory Guide 1.215. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(1) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact Tom Petrak at 706-848-1575.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.02.08e [Index Number 40]

MJY/PGL/amw

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Southern Nuclear Operating Company
ND-18-0980
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Completion Plan for Uncompleted ITAAC 2.1.02.08e [Index Number 40]

ITAAC Statement

Design Commitment:

8.e) The RCS provides emergency letdown during design basis events.

Inspections, Tests, Analyses:

Inspections of the reactor vessel head vent valves and inlet and outlet piping will be conducted.

Acceptance Criteria:

A report exists and concludes that the capacity of the reactor vessel head vent is sufficient to pass not less than 9.0 lbm/sec at 2500 psia in the RCS.

ITAAC Completion Description

The Reactor Coolant System (RCS) provides emergency letdown during design basis events. This ITAAC performs inspections of the reactor vessel head vent valves and inlet and outlet piping to verify that the capacity of the reactor vessel head vent is sufficient to pass not less than 9.0 lbm/sec at 2500 psia in the RCS.

A flow capacity of the Reactor Vessel (RV) head vent pipe routing is restricted (choked) up to the orifice downstream of the RV head vent valves RCS-PL-V150C and -D. The flow resistance of the RV head vent valves and inlet and outlet piping is calculated with Darcy's formula using line routing information (i.e., pipe length, pipe diameter, number and type of pipe fittings, entrance/exit losses and valves) (Reference 1). Following installation, inspections of construction records are performed to verify the line routing information of the RV head vent inlet and outlet piping including valves up to the downstream orifice is consistent with the information in the flow capacity design calculation. The results are used to calculate the as-built flow capacity for each RV head vent flow path using the same methodology used in the flow capacity design calculation (References 2 and 3) and compared to the ITAAC acceptance criteria. The capacity of the RV head vent is sufficient to pass x.x lbm/sec at 2500 psia in the RCS which is not less than 9.0 lbm/sec at 2500 psia.

The results are documented in the Unit 3 and Unit 4 Principal Closure Document (Reference 2 and 3, respectively) and demonstrates the ITAAC acceptance criteria is met.

References 1 thru 3 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.1.02.08e Completion Packages (Reference 4 and 5, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. APP-RCS-M3C-067, Rev 4, "Orifice Functional Requirements for RCS Reactor Vessel Head Vent Flow Orifices (APP-RCS-PY-R01A/B)"

2. Principal Closure Document (Unit 3)

3. Principal Closure Document (Unit 4)

4. 2.1.02.08e-U3-CP-Rev0, ITAAC Completion Package

5. 2.1.02.08e-U4-CP-Rev0, ITAAC Completion Package

6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52"